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F.# 2017R00959

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

RUSLAN MIRVIS,

Defendant.

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STIPULATION & PROTECTIVE ORDER

Docket No. 17-CR-273 (FB)

IT IS HEREBY STIPULATED AND AGREED by the undersigned attorneys  
and ORDERED by the Court, pursuant to Federal Rule of Criminal Procedure 16(d), that:

1. This Protective Order governs documents, images and other material to  
be produced by the government to defense counsel pursuant to Federal Rule of Criminal  
Procedure 16(d) and marked with the word "SENSITIVE" or otherwise identified in writing  
as sensitive (the "Protected Material").

2. The Protected Material may be reviewed only by defense counsel and  
defense counsel's staff (including associate attorneys, paralegals, assistants and potential  
experts employed by defense counsel) for the purpose of defending against the charges in the  
above-captioned case, including but not limited to preparation for trial and any sentencing or  
appeal involving the charges in the above-captioned case. The defendant may review the  
Protected Material only in the presence of defense counsel or defense counsel's staff.

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3. The defendant, defense counsel and defense counsel's staff shall not obtain or create any copies of the Protected Material for disclosure or dissemination to any person other than defense counsel and defense counsel's staff.

4. None of the Protected Material, including copies, notes, transcripts and documents derived or prepared therefrom, shall be disclosed to, or discussed with, the media in any form. Nothing in this Protective Order prohibits the media from obtaining copies of any items that become public exhibits at any conference, hearing, trial or other proceeding.

5. The Protected Material, including all copies, shall be returned to the United States Attorney's Office, within ten days of the completion of the case before the Court or, if an appeal is taken, within ten days of the completion of the case before the United States Court of Appeals for the Second Circuit or the Supreme Court of the United States.

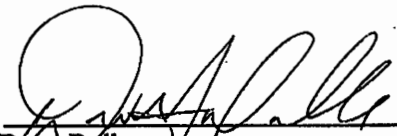
6. Nothing in this Protective Order shall preclude the government from seeking a further protective order pursuant to Rule 16(d) as to particular items of discovery.

7. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

Dated: Brooklyn, New York  
~~January~~, 2018  
February 7, 2018

  
Amanda David, Esq.  
Attorney for Ruslan Mirvis

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York

By:   
Drew Rolle  
Assistant U.S. Attorney

SO ORDERED.

/s/ Frederic Block

THE HONORABLE FREDERIC BLOCK  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK